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UNITED STATES DISTRICT COURT United States Courts Southern
for the District of Texas
Southern District of Texas
FILED

August 31, 2022

United States of America
v.

Adan Lopez-Contreras
COB: Mexico
YOB: 1996

Case No. M-22-1738-M
(Related to: M-22-CR-0985)

Nathan Ochsner, Clerk of Court

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/02/2021 and 5/25/2022 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

8 U.S.C. § 1324 (a)(1)(A)(ii);

-Transporting certain aliens, that being Tomasa Mejia-Oranes, citizen and national of Honduras, along with nine (9) other aliens, all present in the U.S. in violation of law, on or about 11/02/2021.

8 U.S.C. § 1324 (a)(1)(A)(ii), (a)(1)
(A)(v)(II),
and,

-Aiding and Abetting Transporting certain aliens, that being Rosa Angelica Amparo-Maria, citizen and national of the Dominican Republic, and William Enrique Lopez-Lopez, citizen and national of El Salvador, along with seven (7) other aliens, all present in the U.S. in violation of law, on or about 5/25/22.

8 U.S.C. § 1324 (a)(1)(A)(ii), (a)(1)
(A)(v)(I)

-Conspiracy to Transport certain aliens on or about 5/25/2022.

This criminal complaint is based on these facts:

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on August 30, 2022.

See Attachment A

☒ Continued on the attached sheet.

Complaint authorized by AUSA Theodore Parran III

Submitted by reliable electronic means, sworn to
and attested telephonically per Fed. R. Cr.P.4.1, and
probable cause found on:

Date: 08/31/2022 8:05 PM

City and state: McAllen, Texas

Israel E. Escobar Jr.
Complainant's signature

Israel E. Escobar Jr., BPA-I

Printed name and title

[Signature]
Judge's signature

Hon. Nadia Medrano, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

1. On November 2, 2021, at approximately 10:23 AM, a Border Patrol camera operator was conducting surveillance near a landmark known as “The Fishing Hole” in Hidalgo, Texas, and viewed individuals hiding in the brush. The camera operator then viewed those subjects loading into two pickup trucks at that location. The camera operator then relayed this information over service radio, and responding Border Patrol Agents then viewed a black pickup truck and a white pickup truck moving in tandem coming from “The Fishing Hole” crossing over the south levee traveling northbound on Bentsen Rd. The responding Border Patrol agent was able to follow behind the two pickup trucks on Bentsen Rd., and determined that one vehicle was a black Dodge Ram, and the other was a white Chevrolet Silverado. The two vehicles appeared to be continuing to travel and operate in tandem.
2. After the Border Patrol Agent activated his emergency equipment to perform an immigration inspection, both the black Dodge Ram and white Chevrolet Silverado failed to yield. The white Chevrolet Silverado attempted to flee by driving evasively and turned into a warehouse complex at 6900 S. Bentsen Rd., McAllen, Texas. The black Dodge Ram attempted to flee by driving evasively, turning onto W. Military Highway and traveling out of sight in an attempt to escape apprehension. The responding Border Patrol Agent followed the white Chevrolet Silverado into the warehouse complex where, after continued evasive driving, the vehicle came to a stop at a dead end.
3. The responding Border Patrol agent then saw the driver of the vehicle flee from the vehicle wearing a bright yellow reflective vest. Affiant, based on his training and experience, knows that individuals involved in smuggling undocumented aliens often wear reflective vest to blend in with workers in this area and avoid detection. The driver was found by Border Patrol Agents hiding under brush in a canal near the warehouse complex after a short search. Adan Lopez-Contreras, a citizen and national of Mexico, was identified by the responding Border Patrol Agent as the driver of the white Chevrolet Silverado. Border Patrol Agents also found ten (10) other undocumented aliens in the white Chevrolet Silverado, with nine (9) in the passenger compartment and one (1) in the bed of the truck. Each of the ten (10) undocumented aliens found in the white Chevrolet Silverado were interviewed and determined to be present in the United States illegally. Due to a lack of identification of Lopez-Contreras by material witnesses, Adan Lopez-Contreras, along with the other ten (10) undocumented aliens, were arrested and processed administratively.
4. Tomasa Mejia-Oranes, a citizen and national of Honduras, was among the ten (10) undocumented aliens found in the white Chevrolet Silverado on November 2, 2021. Mejia-Oranes confirmed she was a citizen and national of Honduras without lawful permission to enter or remain in the United States. Mejia-Oranes was processed administratively for her immigration violation, placed in removal proceedings, and subsequently paroled into the United States.
5. On May 25, 2022, a Border Patrol camera operator advised via service radio that a blue Dodge pickup truck was traveling south through the floodway on 201 Road into a federal wildlife refuge, and area known for alien smuggling. The truck then returned northbound after

approximately one (1) minute, which is a known smuggling tactic. A Border Patrol agent spotted a vehicle matching the description of the blue Dodge stopped at a red light and observed what appeared to be a person laying horizontally on top of another person through the rear-view window. The vehicle then continued north after the light turned green and the agents conducted a roving patrol stop and immigration inspection. As the agents approached the stopped truck, they witnessed nine (9) people tightly packed into the cab and laying on top of each other. The driver of the vehicle was identified as Leonel Jaramillo who was subsequently arrested and charged.

6. After his arrest, Jaramillo gave a post-Miranda statement admitting to smuggling the illegal aliens and working for a smuggling coordinator that goes by the name "Junior". Jaramillo indicated that, for the May 25, 2022, alien smuggling attempt, he was recruited by "Junior", communicated with "Junior" by phone, and that he had met "Junior" in person when Lopez-Contreras had provided him the vehicle used in the May 25, 2022, incident. Jaramillo stated that on the day he was arrested, "Junior" picked him up at his residence and drove him to the Rooms to Go furniture store. Jaramillo stated that "Junior" told him the vehicle he was going to use to pick up people would be parked in the alley across the street. Jaramillo stated that he was contacted by "Junior" using phone number (830) 380-2507. Subsequent to his arrest, Jaramillo also positively identified "Junior" as Adan Lopez-Contreras from a photo lineup as the coordinator for the May 25, 2022, smuggling event.
7. Rooms to Go is located directly across S 16th St from 1617 Oakland Ave., McAllen, Texas. Agents have observed and photographed Lopez-Contreras at the residence located at 1617 Oakland Ave., and have also observed vehicles that have been seized in alien smuggling events in the alley behind the residence at 1617 Oakland Ave. This alley is also directly across S 16th St from the Rooms to Go location. The Rooms to Go parking lot provides a clear and unobstructed view of the alley to the rear of the residence. Agents have identified a black 2011 GMC Sierra pickup truck with Texas license plates PWW4806 as being utilized by Lopez-Contreras, and, through surveillance, have seen this vehicle parked in the alley behind 1617 Oakland Ave. (across S 16th St from the Rooms to Go) on a number of occasions. The phone number Jaramillo stated was used by Junior, (830) 380-2507, was determined by agents as registered to 1617 Oakland Ave., McAllen, Texas.
8. Rosa Angelica Amparo-Maria, a citizen and national of the Dominican Republic, was among the nine (9) undocumented aliens found in the blue Dodge on May 25, 2022. Amparo-Maria indicated that she and eight (8) others crossed the Rio Grande River on the morning of May 25, 2022, and walked to an area where a truck would meet them. Amparo said when the truck arrived the driver told the group to get in. Amparo told Agents she boarded the truck and sat in the rear seats and several people piled on top of her. Amparo added it was difficult for her to breath or see anything because of the people laying on top of her.
9. Willian Enrique Lopez-Lopez, a citizen and national of El Salvador, was also among the nine (9) undocumented aliens found in the blue Dodge on May 25, 2022. Lopez-Lopez indicated his smuggling arrangements were done in El Salvador and has paid approximately half of an agreed \$15,000 in smuggling fees. Lopez-Lopez claimed he crossed the Rio Grande River in a group of nine (9) on May 25, 2022. Lopez-Lopez said he was instructed to walk to an area

where a blue truck would meet them and take them further. Lopez-Lopez stated he boarded the truck behind the driver when the truck arrived. Lopez-Lopez added he was then apprehended by immigration. Lopez-Lopez identified Leonel Jaramillo, through a photo lineup, as the driver of the blue truck.